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February 8, 2013

By Facsimile (212-805-7942)

Honorable Alvin K. Hellerstein **United States District Court** Southern District of New York 500 Pearl Street, Room 1050 New York, NY 10007

Re:

Aldo Vera, Jr. v. The Republic of Cuba, Civil Action No. 12 cv 1598 (AKH)

Dear Judge Hellerstein:

My firm represents Plaintiff Aldo Vera, Jr. in the above-referenced matter. Plaintiff currently is seeking to enforce the judgment he obtained against The Republic of Cuba.

On January 22, 2013, Plaintiff filed a Motion to Compel Full and Complete Answers to Information Subpoenas (the "Motion") as to three garnishees - M&T Bank. Bank of China, and Standard Chartered Bank (hereinafter "Garnishees"). See Dkt. # 31. That same day, Plaintiff served the Motion on Garnishees M&T Bank and Bank of China via U.S. mail (see Dkt. # 35), and on Garnishee The Standard Chartered Bank via certified mail, return receipt requested (see Dkt. # 33). Accordingly, the Garnishees' responses to the Motion are due on February 8, 2013. The Court has not otherwise set a briefing schedule for this Motion.

Plaintiff has agreed with counsel for M&T Bank and Bank of China - Reed Smith and Thompson Hine, respectively – to grant an additional week for those Garnishees to respond to the Motion. Thus, the response date for Garnishees M&T Bank and Bank of China would be February 15, 2013.

In response to the filing of the Motion, Garnishee Bank of China already has furnished Plaintiff with certain responsive information, and Plaintiff is informed that Bank of China intends to provide additional information sought by Plaintiff in advance of February 15, 2013. Thus, Plaintiff expects to resolve the dispute with Garnishee Bank of China in advance of the extended deadline, and to withdraw the Motion as to Garnishee Bank of China.

Garnishee Standard Chartered Bank has not requested any extension of time, and generally has been unresponsive to Plaintiff's communications over the past

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several months. As such, Plaintiff is not willing to extend the response time for Garnishee Standard Chartered Bank, and would request that the Motion be decided on Plaintiff's papers as to Standard Chartered Bank should Standard Chartered Bank fail to timely file its response on February 8, 2013.

Plaintiff and Garnishees M&T Bank and Bank of China jointly and respectfully request the Court to "So Order" this letter adjourning the time for M&T Bank and Bank of China to respond to the Motion until February 15, 2013. No prior requests for such an adjournment have been made.

Respectfully submitted,

Juny a Shuha Kerry A. Sheehan

Sloan Zarkin (via Facsimile: 212-521-5450) CC:

Reed Smith

Counsel for Gamishee M&T Bank

Emily J. Mathieu (via Facsimile: 212-344-6101)

Thompson Hine

Counsel for Gamishee Bank of China

Standard Chartered Bank (via U.S. Mail)

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